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Subject: Continued Authorization of Tent Platform Sites in Wilderness for 2017-2021

To: Files

This letter to the files concerns the continued authorization of temporary tent platform sites within the Stikine-LeConte Wilderness for the next five years (CY 2017-2021).

In 2016, an interdisciplinary team (IDT) on the Wrangell Ranger District reviewed the existing environmental analysis and past Decision Memos for tent platform sites within the Stikine-LeConte Wilderness. The team reviewed the conditions and uses on the ground and found the tent platforms still fit within the past environmental analysis and decisions. The interdisciplinary team identified no significant impact on the wilderness resource from the temporary tent platform use. It was noted that the presence of Wilderness can be an extraordinary circumstances in environmental analysis. As the legislation that designated the Stikine-LeConte Wilderness provides for temporary structures, including tent platforms, necessary for the taking of fish and wildlife (including moose hunting), an extraordinary circumstance is null. Sensitive, Threatened and Endangered species considerations were updated by the IDT to include all current listings for the area. The invasive plants risk assessment was also reviewed completed for the tent platform sites.

According to Forest Service Handbook 1909.15-2012-3 Section 18.3, Reconsideration of Decisions Categorically Excluded from Environmental Documentation, no further National Environmental Policy Act (NEPA) action will be taken if an interdisciplinary review shows that the proposed action still fits within the identified category, and no extraordinary circumstances exist. As the IDT found the proposal to continue the limited use of hand portable motorized winches and chainsaws still fits within the previous decisions, and no extraordinary circumstances exist; I am not issuing a new NEPA decision. The action continues to be categorically excluded from documentation in an environmental impact statement or environmental assessment. The action still falls within a category established by the Chief of the Forest Service, and listed in Forest Service Handbook 1909.15-2014-1 (05/28/2014), section 32.12(8). That category includes the continuation of minor, short-term (one year or less) special uses of the National Forest System lands, and is cited as category 36 CFR 220.6(d)(8). This action falls within a category of actions which are not subject to administrative review (objection process) opportunities. Implementation of this decision may occur immediately.

The Wrangell District Ranger is the Deciding Official on tent platform continuation in Wilderness. On August 29, 1995, the Forest Supervisor, Stikine Area, delegated the Wrangell District Ranger the authority to approve NEPA decision documents regarding continued use of tent platform sites.



Action: This letter documents the IDT analysis and my action to authorize up to eighteen-tent platform sites for the next five years within the Stikine-LeConte Wilderness based on the environmental analysis and Decisions Memos from 1995, 1998, 2002, 2007 and 2011. TABLE 1, and the TENT PLATFORM MAP, attached to this document, list and identify the locations of the eighteen tent platform sites. Three of the tent platform sites are currently permitted and occupied with structures. The remaining fifteen sites are vacant of permitted structures. I will continue to approve authorizations for the three occupied sites, and issue new authorizations for the fifteen vacant sites, as needed to serve the public during the next five years (CY 2017-2021). This action to approve tent platform continuation is consistent with the Forest Supervisor's delegation.

Section 1316 of the Alaska National Interest Lands Conservation Act of 1980 (ANILCA) provides for the use of tent platforms necessary for the taking of fish and wildlife. The Forest Service Manual, Alaska Wilderness Supplement (R10 Supplement 2300-2008-2 (11/25/2008), section 2323.04d (12)), states the Forest Supervisor is responsible to approve temporary facilities related to the taking of fish and wildlife. On September 29, 1995, the Forest Supervisor, Stikine Area, delegated the Wrangell District Ranger the authority to issue special use permits for temporary tent platforms for the taking of fish and wildlife on sites that have been approved by the NEPA process. The Tongass Land and Resource Management Plan 2008 (TLRMP), Wilderness Management Prescription, limits tent platforms permits to a period not to exceed one-year, which may be renewed. (Land2.E.1, page 3-14) My decision to issue tent platform permits is consistent with that Supervisor's delegation and the TLRMP direction. However, TLRMP may change to five-year permits with the plan amendment being prepared.

Past NEPA

Tent platforms have been approved through four Decision Memos issued during the past years. In 1995, two environmental analyses were conducted for the renewal of existing special use permits and the issuing of new permits for tent platforms and cabins in the Wilderness. The Wrangell District Ranger's Decision Memo of June 1, 1995, in part approved the renewal of four existing tent platform permits; while the Forest Supervisor's Decision Memo of October 20, 1995, approved 11 new tent platform sites. The Forest Supervisor issued a Decision Memo on July 14, 1998 approving another new tent platform site. The Wrangell District Ranger issued a Decision Memo on September 3, 2002 approving an additional new tent platform site. Lastly, the Forest Supervisor issued a Decision Memo on August 16, 2007 approving another tent platform site. A total of eighteen (18) tent platform sites in the Stikine-LeConte Wilderness have been approved in the past.

In 2000, 2001, 2007 2011 and 2016 interdisciplinary teams on the Wrangell District reviewed the existing environmental analysis and Decision Memos for tent platforms within the Stikine-LeConte Wilderness. They found that the continuation of the tent platforms still fit within the identified category for exclusion from further environmental analysis in an EIS or EA; and there were no extraordinary circumstances. The Wrangell District Ranger has issued letters on October 20, 2000 authorizing tent platforms for CY 2001; November 20, 2001 authorizing tent platforms for CY 2002-2006; May 8, 2007 authorizing tent platforms for CY 2007-2011; and November 21, 2011 authorizing tent platforms for CY 2012-2016, (FSH 1909.15, section 18.3).

Starting in 2001, as required by the Tongass National Forest Land and Resource Management Plan, Wilderness Management Prescription, temporary tent platforms have been authorized by one-year permits. TLRMP may change to five-year permits with the plan amendment being prepared.

Minimum Requirement Analysis

The Forest Service Manual, Alaska Wilderness Supplement (R10 2300-2008-2 (11/25/2008), section 2322.03 (6) states that all management decisions affecting wilderness must be consistent with the minimum requirement concept in the Wilderness Act. A Minimum Requirements Analysis (MRA) using a Minimum Requirement Decision Guide or other similar two-step process is to be used. The minimum requirement concept will be applied to the prohibited uses in Section 4(c) of the Wilderness Act unless the uses are authorized under ANILCA. The Wilderness Act generally prohibits structures in Wilderness, but ANILCA provides for the use of temporary structures necessary for the taking of fish and wildlife.

The Wrangell Ranger District has received applications for the construction and maintenance of tent platforms as needed to support moose hunting in the Stikine River valley, within the Stikine-LeConte Wilderness. I have determined that the facilities are needed as a practical necessity to support legal hunting activities that occur within the Wilderness.

Section 1316 of ANILCA provides for the use of temporary equipment and facilities, including tent platforms, necessary for the taking of fish and wildlife. Forest Service Handbook, R10 Supplement 2709.11-2006-4, 41.2(1) (d) (12/22/2006) includes the following direction: Tent platforms authorized are a structure constructed to provide a solid level floor for a tent. It is usually made of manufactured timber products. Partial walls not exceeding four (4) feet in height above the floor may be employed. Only the tent fabric, the door, the ridgepole, and its support poles may extend higher than four (4) feet above the floor. The tent platform size may be varied, but shall not exceed 320 square feet.

The Tongass Land and Resource Management Plan 2008, Wilderness Management Prescription, includes some direction (Land2.E.7(a), page 3-15) The time of occupancy for the tent platform is limited to coincide with hunting season for the species for which the temporary facility is being used. The annual moose-hunting season in the Stikine River valley is from September 15 through October 15. The tent platform may remain on site throughout the year; however, all structural sidewalls and tent framing must be dismantled when the platform is not in use so that no part of the structure extends more than thirty (30) inches above the ground. Any components of the approved structure and equipment stored on site shall be left in an orderly and consolidated state. At the end of the specified occupancy any unnecessary equipment must be removed from the site.

Temporary tent platform camps are the least intrusive customary and traditional structure allowed by ANILCA for moose hunters to use in the Wilderness. I find those temporary tent platforms are the "minimum tool" needed to facilitate moose hunter's camps.

Following are some conditions that I will include in the tent platform permits to ensure protection of the wilderness resource.

1. The tent, tent frame and partial walls may be erected for use no more than 60 days per year. The time of occupancy for the tent platform is limited to coincide with the annual moose-hunting season in the Stikine River valley. At the end of that period the tent will be taken down and the tent frame laid flat on the platform. Unnecessary equipment will be removed from the site.
2. The outhouse shall cover a pit toilet and shall not exceed 3 ft. by 3 ft. The outhouse pit shall be constructed and maintained in a manner that minimizes the potential for small mammals and amphibians to fall in and become trapped in the pit.
3. Within Wilderness, sites are managed so as to preserve their natural condition with the imprint of man's work substantially unnoticeable. The tent platform, tent and outhouse must be made of materials and colored to blend with and be visually compatible with the surrounding landscape. Colors of earth tones such as browns, dull shades of green or camouflage are encouraged.
4. The permit area is within an area where brown bears have been reported. The holder must use bear-proof food storage and garbage disposal methods to prevent habituation of bears to human foods and reduce the likelihood of bear-human incidents.
5. The tent platform special use permits will not authorize any motorized equipment at the site.

This letter to the files documents the analysis for approval of temporary tent platforms for moose hunting within the Stikine-LeConte Wilderness for the next five years (CY 2017-2021).



ROBERT J. DALRYMPLE
District Ranger

TABLE 1**TENT PLATFORM SITES WITHIN THE STIKINE-LECONTE WILDERNESS**

	GENERAL LOCATION	LEGAL LOCATION	PERMIT HOLDER
1	DRY ISLAND, NORTH ARM	NE/SE/SE SEC 15 T60S, R 82E, CRM	VACANT
2	DRY ISLAND, NORTH ARM	NE/SE/SW SEC 14 T60S, R 82E, CRM	DAVID BENITZ
3	FARM ISLAND, NORTH ARM	SE/NE/SE SEC 18 T60S, R 83E, CRM	STEPHEN CONNOR
4	SERGIEF ISLAND, MAIN ARM STIKINE RIVER	NW/NE/SW SEC 14 T61S, R83E, CRM	VACANT
5	WARM SPRINGS ISLAND, KETILI RIVER (PRUCI TREE)	NW/NW/NE SEC 11 T60S, R85E, CRM	VACANT
6	WIZARD (ROCK) ISLAND, STIKINE RIVER	NE/NW/NE SEC 15 T60S, R85E, CRM	VACANT
7	MAINLAND, KETILI RIVER, (ACROSS GROSS TREE)	SW/SW/SE SEC 12 T60S, R85E, CRM	VACANT
8	MAINLAND, KETILI RIVER, (BENJAMIN TREE)	SW/NW/SE SEC 12 T60S, R85E, CRM	VACANT
9	MAINLAND, KETILI RIVER (BELOW HOT TUB SLOUGH)	SW/SE/SW SEC 28 T59S, R85E, CRM	VACANT
10	MAINLAND, KETILI RIVER (UPPER END, NEIMEYER TREE)	SW/SW/SW SEC 7 T60S, R86E, CRM	VACANT
11	MAINLAND, SHAKES SLOUGH (W SHORE, CLEAR WATER CR)	SE/NE/SE SEC 26 T59S, R84E, CRM	VACANT
12	MAINLAND, STIKINE RIVER (NORTH SHORE BELOW SHAKES SLOUGH)	NE/NE/NE SEC 3 T60S, R84E, CRM	CHARLES JENKINS
13	MAINLAND, STIKINE RIVER, (NORTH SHORE LOWER KETILI RIVER)	NE/SE/NW SEC 31 T59S, R85E, CRM	VACANT
14	MAINLAND, KETILI CREEK (LOWER PARADISE CREEK)	SW/NE/SE SEC 2 T60S, R85E, CRM	VACANT
15	MAINLAND, BARNES (PARADISE) LAKE	SW/SW/NE SEC 17 T60S, R86E, CRM	VACANT
16	MAINLAND, NORTH ARM STIKINE RIVER AND COHO CREEK	NW/NW/NW SEC 10 T60S, R82E, CRM	VACANT
17	LIMB ISLAND, HOOLIGAN SLU (ACROSS DOG SALMON CR)	NW/SE/SW SEC 11 T60S, R83E, CRM	VACANT
18	DRY ISLAND, KNIG SLOUGH (BIGELOW)	NE/SW SEC23 T60S, R82E, CRM	VACANT

TENT PLATFORM MAP

